

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT
OF TENNESSEE, AT WINCHESTER:**

ANTHONY LIEDERMAN

VERSUS

CASE NO: 4:18-CV-53-JRG-SKL

**GRUNDY COUNTY SHERIFF'S
DEPARTMENT, ET AL**

**PLAINTIFF'S STATEMENT OF ADDITIONAL MATERIAL FACTS ABOUT WHICH
THERE IS NO GENUINE DISPUTE, IN OPPOSITION TO THESE DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Comes plaintiff, by and through counsel, and, pursuant to **FRCP 56**, submits this, his **Statement of Additional Material Facts About Which There is No Genuine Dispute, in opposition to these defendants' Motion for Summary Judgment**, as follows:

1. All ten (10) Grundy County Sheriff's Officers, who showed at plaintiff's home on July 25, 2017, to execute the search warrant, as well as these two (2) defendants, were wearing body cameras. **(EXHIBIT S, and EXHIBIT T, Deposition of Sims, pp. 130-131)**

RESPONSE:

2. To this date, over twenty-six (26) months after the execution of the search warrant at plaintiff's home on July 25, 2017, neither (a) these defendants, (b) the 12th Judicial District Drug Task Force, (c) the Grundy County Sheriff's Department, (d) any Grundy County Sheriff's Deputy, (e) the Grundy County Sheriff, (f) any Assistant District Attorney General of the 12th Judicial District, (g) the District Attorney General of the 12th Judicial District, (h) the Hon. Herbert Slatery, Attorney General of the State of Tennessee, (i) any other Assistant Attorney General whatever, and/or (j) any officer of the State of Tennessee, has produced any

videotape or audiotape of the execution of the search warrant aforesaid on July 25, 2017 within the scope of my criminal litigation. **(EXHIBIT S, EXHIBIT T)**

RESPONSE:

3. Assistant Attorney General McGovern of the 12th Judicial District stated in open court in December, 2018, during the probation revocation hearing for plaintiff that 29 or more cases involving discredited criminal informant Tina Prater had been dismissed by his office, and that Tracy City Police Chief, Charlie Wilder, and Ms. Prater were under investigation for fraud. Further, the Honorable Justin Angel, Circuit Court Judge for the 12th Judicial District of Tennessee, stated that the District Attorney General's office was to, henceforth, never bring any criminal cases into his court wherein Tina Prater was an informant. **(EXHIBIT U)**

RESPONSE:

ANTHONY LEIDERMAN

S/Edward L. Kershaw

Edward L. Kershaw, BPR # 016775

S/Francis X. Santore, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on **October 13, 2019**, a copy of the foregoing **Plaintiff's Statement of Additional Material Facts as to Which There is No Genuine Dispute**, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

S/Francis X. Santore, Jr.